



Federal Regulatory Affairs  
1800 M Street, NW, Suite 800N  
Washington, DC 20036

December 9, 2016

**VIA ECFS**

Ms. Marlene H. Dortch  
Secretary  
Federal Communications Commission  
445 12th St., S.W.  
Washington, D.C. 20554

Re: *Connect America Fund*, WC Docket No. 10-90

Dear Ms. Dortch:

On August 26, 2016, Frontier Communications Corp. ("Frontier"), pursuant to 47 C.F.R. § 54.312(c)(4), submitted a list of 3,146 census blocks not previously identified in its election of Connect America Fund ("CAF") Phase I Round 2 incremental support.<sup>1</sup> Shortly thereafter, on September 7, 2016, the Wireline Competition Bureau put out a public notice announcing this filing.<sup>2</sup> With today's filing, Frontier is including a list of the specific locations associated with the census blocks that it intends to count as part of CAF Phase I Round 2 and is filing its certification as required under 47 C.F.R. § 54.312(c).<sup>3</sup>

Pursuant to 47 C.F.R. § 54.312(c) the undersigned certifies that:

- (i) The locations to be served to satisfy the deployment obligation are not shown as served by fixed broadband at the speeds specified in 47 C.F.R. § 54.312 (c)(2) or (c)(3) provided by any entity other than Frontier or its affiliate on the version of the National Broadband Map;
- (ii) To the best of Frontier's knowledge, the locations would, in fact, be unserved by fixed Internet access with speeds of at least 3 Mbps downstream and 768 kbps upstream, or 768 kbps downstream and 200 kbps upstream, as appropriate, without CAF Phase I Round 2;
- (iii) Frontier's current capital improvement plan did not already include plans to complete broadband deployment within the next three years to the locations to be counted to satisfy the deployment obligation;
- (iv) Incremental support will not be used to satisfy any merger commitment or similar

---

<sup>1</sup> See Letter from AJ Burton, Director, Federal Regulatory Affairs, to Marlene H. Dortch, Secretary, Federal Communications Commission, WC Docket No. 10-90 (filed Aug. 26, 2016).

<sup>2</sup> See *Wireline Competition Bureau Announces Deadline for Existing Providers to Notify Frontier Communications Corp. that They Serve Census Blocks that Frontier Communications Corp. Proposes to Serve with Connect America Phase I Incremental Support*, Public Notice, 31 FCC Rcd 9723 (Sept. 7, 2016).

<sup>3</sup> See Attachment A.

regulatory obligation;

- (v) Frontier has undertaken due diligence to determine the locations in question are not within the service area of either Broadband Initiatives Program or the Broadband Technology Opportunities Program projects that will provide Internet access with speeds of at least 3 Mbps downstream and 768 kbps upstream;
- (vi) Frontier has prioritized its projects so as to maximize the deployment of broadband-capable infrastructure to locations lacking Internet access with speeds of 768 kbps downstream and 200 kbps upstream. Frontier has explored deployment to all locations lacking 768 kbps downstream and 200 kbps locations for which it is economically reasonable before addressing those lacking speeds of 3 Mbps downstream and 768 kbps upstream; and
- (vii) Pursuant to §54.312(c)(8), Frontier certifies that for locations identified as served by “Frontier only,” on the latest version of the National Broadband Map, without CAF Phase I Round 2, the locations would not actually receive speeds of 3 Mbps upstream and 768 kbps downstream and the locations would be served through copper-fed digital subscriber line access multiplexers.

Frontier notes that several parties submitted objections to the census blocks that Frontier originally submitted.<sup>4</sup> At this time, Frontier is not including any census blocks to which these parties objected as part of today’s list of locations that Frontier intends to include as part of CAF Phase I Round 2.<sup>5</sup> However, Frontier has filed a response to the objection it received from one party – StarTouch – because Frontier believes it is more likely than not that these blocks remain unserved despite StarTouch’s claims.<sup>6</sup> If Frontier receives a favorable decision as to those census blocks, Frontier will file a certification as to those census blocks at that time.

---

<sup>4</sup> See Letter from Mary McManus, Executive Director, Regulatory Affairs, Comcast, to Marlene Dortch, WC Docket No. 10-90, (filed Oct. 21, 2016); Letter from Stacie Scheffer, Operations Manager, StarTouch, WC Docket No. 10-90 (filed Oct. 5, 2016); Letter from K.C. Halm, Counsel for WaveDivision Holdings, LLC, to Marlene Dortch, WC Docket No. 10-90, (filed Oct. 24, 2016); Letter from Samuel L. Feder, counsel to Charter Communications, Inc. to Marlene Dortch, WC Docket No. 10-90, (filed Oct. 24, 2016); Letter from K.C. Halm, Counsel for Suddenlink, to Marlene Dortch, WC Docket No. 10-90, (filed Oct. 24, 2016); Letter from K.C. Halm, Counsel for Shentel Communications, to Marlene Dortch, WC Docket No. 10-90, (filed Oct. 24, 2016); Letter from Shawn Beqaj, VP – Regulatory and Interconnection, Armstrong, to Marlene Dortch, WC Docket No. 10-90, (filed Oct. 24, 2016).

<sup>5</sup> Frontier inadvertently included 29 census blocks for which it already had authorization to deploy. See Letter from Michael D. Saperstein, Jr., to Marlene H. Dortch, Docket No. 10-90 (filed Mar. 3, 2014). A list of these census blocks is attached as Attachment B. Because Frontier already had authorization to deploy to these census blocks, any objections to these census blocks due to Frontier’s initial erroneous inclusion of these census blocks in its list submitted on August 26, 2016, is irrelevant.

<sup>6</sup> Letter from AJ Burton, Frontier Communications, to Marlene H. Dortch, FCC, Docket No. 10-90 (filed Oct. 28, 2016).

Please contact AJ Burton, Director of Federal Regulatory Affairs, at 202-223-6807 or [aj.burton@ftr.com](mailto:aj.burton@ftr.com) should you have any questions.

Sincerely,

A handwritten signature in black ink that reads "Michael P. Golob". The signature is written in a cursive style with a large, stylized "M" and "G".

Michael Golob  
Senior Vice President, Engineering  
Frontier Communications

Attachments

cc: Alex Minard  
Heidi Lankau